



*Environmental Engineering, Civil Engineering
Forensic Engineering, Construction Services*

**ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT
FEBRUARY 2018**

**Former United Shoe Machinery Division North Parcel
181 Elliott Street
Beverly, MA 01915**

Prepared for:

Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801

Prepared by:

FSL Associates, Inc.
358 Chestnut Hill Avenue
Boston, MA 02135

March 14, 2018

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	FEBRUARY 2018 ACTIVITIES.....	2
3.0	NEXT SCHEDULED ASSESSMENT ACTIVITIES.....	3

APPENDICES

Figures

Figure 1 – Locus Plan

Figure 2 – Site Plan

1.0 INTRODUCTION

This Progress Report was prepared in order to detail the field and sampling activities associated with the former United Shoe Machinery (USM) Division North Parcel at 181 Elliott Street in Beverly, Massachusetts (also referred to as the “Site”). Actions completed in this report relate to the approved Written Proposal/Sampling and Analysis Plan Revision 2 (“SAP”) for the Site dated September 29, 2017 and the Elliott Landing SAP Revision 4 dated September 29, 2017 (“Elliott Landing SAP”). Refer to the attached **Figure 1** for the site locus and **Figure 2** for the site plan.

This Site has been identified in the RCRA 2020 Corrective Action Universe list established by the United States Environmental Protection Agency (EPA). By the year 2020, EPA and the authorized states plan to have largely completed the work of implementing final remedies at all facilities requiring Corrective Action. This Site is listed under site number MAD 043415991 as USM Machinery Division. As part of the RCRA 2020 program, EPA is overseeing an audit of the historical remedial actions conducted at the property by the former property owner. EPA Region 1 has been working with the current owner’s representative, Cummings Properties, LLC, on this site since 2009, and in EPA’s opinion, more sampling data is needed to, among other things, understand whether vapor intrusion may be impacting indoor air quality and posing a threat to human health.

Following an EPA audit and review of existing sampling data, EPA requires further examination to determine:

- whether vapor intrusion is occurring at the locations identified by EPA, including but not limited to, buildings 100, 500, and 600;
- whether contamination exists in the Shoe Ponds that presents ecological risks to aquatic life;
- whether all underground storage tanks have been removed or properly abandoned, if there are releases to the environment from the tanks, and the nature and extent of any migration of contamination from existing tanks;
- whether residual polychlorinated biphenyl (PCB) contamination exists on the fourth floor of Building 100 (formerly occupied by the North Shore Regional Vocational School) in or proximate to the former machine shop and any other area on-site where PCBs were used/managed/released and/or identified as a contaminant of concern;

- whether the PCB disposal areas (former chip grind shed and former ballfield area) meet the requirement of 40 CFR § 761.61 and the January 9, 1997 approval letter from EPA, including but not necessarily limited to the following:
 - (1) required protective cover,
 - (2) required cover maintenance,
 - (3) required AUL documentation, and
 - (4) appropriate documentation to verify that stabilized PCB contaminated soils were placed at least one foot above the high water table so that no migration of PCBs to groundwater is occurring.

These requirements were set forth in an Administrative Consent Order (ACO) between EPA and Cummings Properties, LLC with an effective date of April 13, 2017.

Specifically, this report documents actions that have taken place in January 2018 in furtherance of the work required in the ACO. Such actions have included the first round of sampling and analysis of groundwater from selected Site wells (wells related to the vapor intrusion assessment), and the first round of sampling and analysis of soil gas and indoor air from the previously designated Site interior building locations. Work was done in accordance with the SAP and the Elliott Landing SAP as updated September 29, 2017.

2.0 FEBRUARY 2018 ACTIVITIES

No field sampling was performed in February 2018. There were no scheduled field activities based on the SAP or the Elliott Landing SAP.

Actions taken in February 2018 included the submittal of the January 2018 Progress Report along with the initial conclusion that based on the January 2018 sampling round, there is no evidence of vapor intrusion at the Site. Additional actions included notification to EPA of the scheduled March 20, 2018 groundwater sampling event and the submittal of a letter to EPA summarizing the elements of a work plan for a Baseline Ecological Risk Assessment (BERA) for the Upper and Lower Shoe Ponds. This letter requested EPA feedback prior to the submittal of a full BERA work plan.

On February 28, 2018, Cummings Properties received comments from EPA on the two previously submitted Progress Reports (November-December 2017 and January 2018). These comments are being reviewed and a request has been made to EPA for clarification on these comments. A conference call with EPA was conducted on March 12, 2018 to discuss EPA's technical review of the November-December 2017 and January 2018 Progress Reports and to clarify Cummings Properties responses.

3.0 NEXT SCHEDULED ASSESSMENT ACTIVITIES

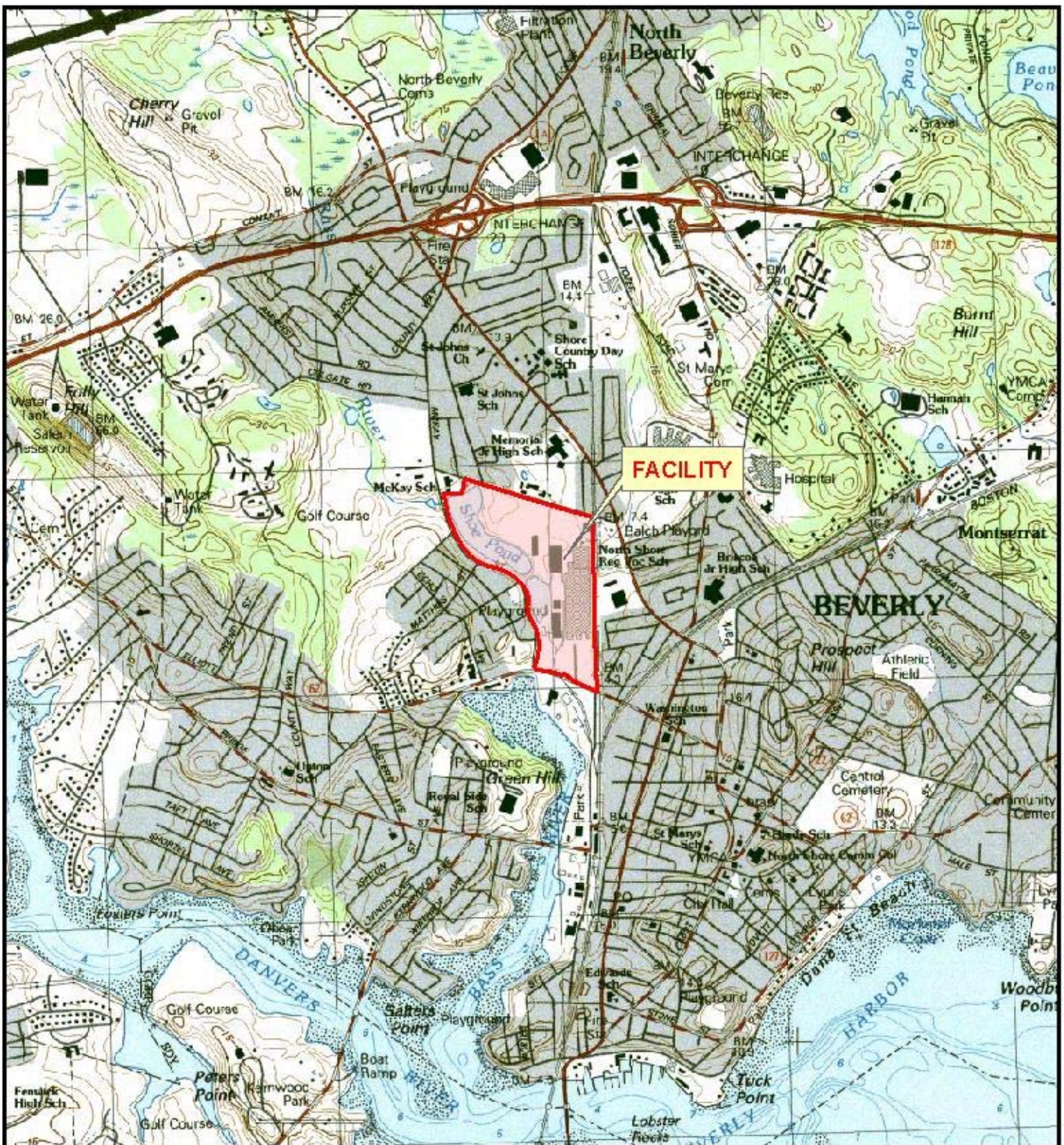
In accordance with the Site SAP and the Elliott Landing SAP, the next sampling had been scheduled for March 20, 2018 for groundwater wells related to historical groundwater contamination and in April 2018 for vapor intrusion evaluation. Due to further well development that is required (one of EPA's comments on the November-December 2017 Progress Report), the March 20, 2018 sampling is to be postponed until March 26, 2018. The results from the March 2018 sampling will be included in a Progress Report to be submitted to EPA in April 2018; the results from the April 2018 sampling will be included in a Progress Report submitted in May 2018.

Based on one of the EPA comments received on February 28, 2018, the groundwater wells installed in November 2017 will be redeveloped during the week of March 12, 2018 in accordance with the SAP using the bailing and purging method.

FIGURES

Figure 1 – Locus Plan

Figure 2 – Site Plan



SITE COORDINATES
 Longitude: -70.8871 W
 Latitude: 42.5596 N
 UTM 4,713,634m N
 345,086m E



Approximate Scale: 1 inch = 2,000 feet (1:24,000)

Figure 1 - Locus Plan

Project Number: 12201
 Client: Cummings

Created By: EAF Date: 03/15/12
 Checked By: BH Date: 03/15/12

Former United Shoe Machinery North Parcel
 181 Elliott Street
 Beverly, MA

Reference: MassGIS USGS Quadrangle: SALEM and MARBLEHEAD NORTH
 Image: M\12201_Beverly\2012\Figures



FIGURE 2

SITE PLAN

FORMER UNITED SHOE
MACHINERY NORTH PARCEL
181 ELLIOTT STREET
BEVERLY MA

LEGEND

-  STABILIZED SOIL DISPOSAL AREA
-  TANKS
-  FSL-X PROPOSED WELL
-  HISTORIC PHASE II WELL

NORTH 



358 CHESTNUT HILL AVENUE
BOSTON MASS 02135
(617) 233-0001

NOTE:
Locations taken from Haley & Aldrich Plan
Dated October 30, 1997.

SCALE:	1'=125' +/-
DRAWN:	RT
CHK'D:	BAH
DATE:	3/29/17
DATE REV:	3/12/18